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U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

RUSSELL G. GREER,

Plaintiff

v.

TAYLOR A. SWIFT,

Defendant

**PLAINTIFF'S SECOND EMERGENCY
MOTION FOR EXTENSION OF TIME TO
SERVE SUMMONS**

Case No.: 3:18-cv-00394

Presiding Judge: Aleta A. Trauger

Magistrate Judge: Alistair Newbern

Pursuant to *Federal Rules of Civil Procedure 6(b)*, Plaintiff Russell Greer moves this Court for an extension of time, with a second EMERGENCY MOTION requesting for said extension. In support of this second EMERGENCY MOTION, Greer states as follows:

BACKGROUND

1. Plaintiff filed with the Court an Emergency Motion requesting an Extension of Time to serve Defendant, on 12/28/2018 (Doc. 18). Along with that Motion, he filed a Motion to Issue a Subpoena (Doc. 18).
2. Greer requested to have the new deadline be 02/08/2019.
3. Greer laid out all arguments for why he was seeking such relief.
4. An entire month went by and Plaintiff has unfortunately not heard from the Court.
5. Greer respectfully submits a second request, with a new proposed date to have service had on Defendant.

SECOND REQUEST FOR EXTENSION OF TIME

6. *Rule 6(b)* gives the Court discretion to grant a motion to extend a deadline for good cause before the deadline expires. Good cause is herein shown.
7. As previously stated in Documents 18 and 19, Greer's now only realistic opportunity of serving Defendant is through her management. But as was also shown, the management only has a P.O. Box publicly listed.
8. Greer reached out to the UPS Store Manager to have the manager hand over the information connected to the P.O. Box. The manager refused and said he would only hand over documents if subpoenaed to do so. (Doc. 19).
9. Greer is being respectful of the Court's time and busy docket, but also respectfully hopes that this Motion can be granted.
10. Greer has laid out real harms and real claims in his Complaint that shows that this case has merit and such claims can be upheld through finding of law by a judge or

finding of facts by a jury and therefore this Motion should be granted so that Plaintiff can serve the subpoena on the UPS store.

11. Greer proposes a new date of 02/28/2019 for the Complaint to be served by, as he is sure the Subpoena will be granted before then and he can retrieve the address for service.

CONCLUSION

12. Given the explanation contained above as to why an extension of time should be granted, Plaintiff moves this Court to set a new deadline of 2/28/2019 for service to be had.

DATED: January 22, 2019

Respectfully,

Russell Greer
Pro Se Litigant
/rgreer/

A handwritten signature in black ink, appearing to be 'R Greer', with a stylized flourish at the end.

CERTIFICATE OF SERVICE:

I certify that on December 23rd, 2018, a true and correct copy of PLAINTIFF'S EMERGENCY MOTION FOR EXTENSION OF TIME was emailed and mailed to the following:

Natalya Rose, IP attorney for defendant, at: nrose@roseipfirm.com